

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JULIAN BRADLEY	:	
Plaintiff	:	CIVIL ACTION
	:	NO. 17-1587
vs.	:	
SEARAY LLC d/b/a	:	
EASYACC.COM, INC.,	:	
and AMAZON.COM, INC.	:	
Defendants	:	

**PRAECIPE OF THE PLAINTIFF TO ENTER DEFAULT JUDGMENT
AGAINST DEFENDANT, SEARAY LLC d/b/a/ EASYACC.COM, INC**

TO THE CLERK OF COURT:

Kindly enter Default Judgment against Searay LLC d/b/a/ Easyacc.com, INC in the above captioned matter. On June 22, 2017, Defendant, Easyacc.com, INC was personally served with a copy of the complaint. *See Certificate of service attached hereto as Exhibit "A."* On July 25, 2017, Honorable Mitchell S. Goldberg of the Eastern District of Pennsylvania ruled that Defendant, Easyacc.com, INC "has failed to file an answer" in this matter and permitted Plaintiff to file a request with the Clerk of this Court for Entry of Default pursuant to Rule 55 of the Federal Civil Procedure within fourteen (14) days. *See Honorable Mitchell S. Goldberg's Order dated July 25, 2017 attached hereto as Exhibit "B."* Counsel for Plaintiff and Counsel for Defendant, Amazon.com, INC signed a stipulation amending the caption to make Searay LLC d/b/a/ Easyacc.com, INC as a proper Defendant and, on July 31, 2017, the same was approved by Honorable Mitchell S. Goldberg of this Court. *See the signed stipulation attached hereto as Exhibit "C."* Default Judgment should be entered against Defendant, Searay LLC d/b/a/ Easyacc.com, INC in this matter.

RESPECTFULLY SUBMITTED:



FEEDA R. MUSITIEF, ESQUIRE
Attorney for Plaintiff

Date: _____

9-7-17

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JULIAN BRADLEY	:	
Plaintiff	:	CIVIL ACTION
	:	NO. 17-1587
vs.	:	
SEARAY LLC d/b/a	:	
EASYACC.COM, INC.,	:	
and AMAZON.COM, INC.	:	
Defendants	:	

CERTIFICATE OF SERVICE

I do hereby certify that service of a true and correct copy of Plaintiff's Praeipe to enter Default Judgment against Defendant, Searay LLC d/b/a/ Easyacc.com, INC was electronically mailed and/or mailed via first class postage prepaid mail, on the date shown below to all interested counsel and parties as follows:

Searay LLC d/b/a/ Easyacc.com, INC
3483 Stoneham Drive
Duluth, GA 30096

Keith D. Heinold, Esquire
MARSHALL, DENNEHEY WARNER
COLEMAN & GOGGIN
2000 Market Street, Suite 2300
Philadelphia, Pa. 19103

FINE AND STAUD LLC

Date: 9-7-17

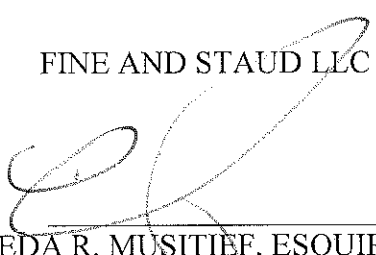

FEEDA R. MUSITIEF, ESQUIRE
Attorney for Plaintiff

EXHIBIT "A"

JULIAN BRADLEY

Plaintiff

v3

EASYACC.COM, INC., ET AL

Defendant



20170620164352

Count Of

Venue

Docket Number: 2 17 CV 01587 MSG

Person to be served (Name and Address):

EASYACC.COM, INC.
3483 STONEHAM DRIVE
DULUTH GA 30098
By serving: LI JIANG

Attorney: FEEDA R. MUSITIEF, ESQ.

Papers Served: CIVIL COVER SHEET, NOTICE TO PLEAD, COMPLAINT, AND VERIFICATION

Service Date: ☒ Served Successfully ☐ Not Served

Date/Time:

6/22/17 2:50 PM

☐ Delivered a copy to him/her personally

☐ Left a copy with a competent household member over 14 years of age residing therein (indicate name & relationship at right)

☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc. (indicate name & official title at right)

AFFIDAVIT OF SERVICE
(For Use by Private Service)

Cost of Service pursuant to R. 4:4-3(c)

\$

Name of Person Served and relationship/title:

Li Jiang
Principal

Description of Person Accepting Service:

SEX: F AGE: 25⁷⁰ HEIGHT: 5'4" WEIGHT: 125 lbs SKIN: Asian HAIR: Black OTHER:

Unserved:

- ☐ Defendant is unknown at the address furnished by the attorney
- ☐ All reasonable inquiries suggest defendant moved to an undetermined address
- ☐ No such street in municipality
- ☐ Defendant is evading service
- ☐ Appears vacant
- ☐ No response on:

Date/Time: _____
Date/Time: _____
Date/Time: _____

Other:

Served Date:

Subscribed and Sworn to me this

26th day of June, 2017

Notary Signature:

Deborah A. Duchon

Name of Notary

Commission Expires

EXPIRES
GEORGIA
NOV. 14, 2018

Jean Nichols

was at the time of service a competent adult, over the age of 18 and not having direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Jean Nichols
Signature of Process Server

6/20/17
Date

Name of Private Server:

Jean Nichols

Address: 2009 Morris Avenue UNION, NJ 07093 Phone: (908) 872-1952

EXHIBIT "B"

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JULIAN BRADLEY,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	No. 17-1587
	:	
EASYACC.COM, INC. AND	:	
AMAZON.COM, INC.,	:	
	:	
Defendants.	:	

ORDER

AND NOW, this 25th day of July, 2017, upon review of the Court's records, the Court notes that Defendant, EasyAcc.com, Inc., has failed to file an answer in the above-captioned case.

WHEREFORE, Plaintiff may file a request with the Clerk for entry of a default in accordance with Rule 55 of the Federal Rules of Civil Procedure. If the Request for Default is not filed within fourteen (14) days, the Court will enter an order dismissing the case against the above-named defendant for lack of prosecution.

BY THE COURT:

/s/ Mitchell S. Goldberg

Mitchell S. Goldberg, J.

EXHIBIT "C"

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JULIAN BRADLEY

Plaintiff

CIVIL ACTION
NO. 17-1587

vs.

EASYACC.COM, INC.,
and AMAZON.COM, INC.

Defendants

It is hereby STIPULATED between Counsel for all parties that the case caption be amended as follows:

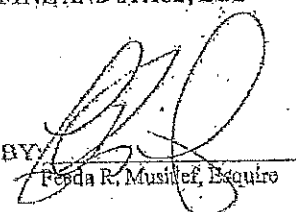
1. Defendant, Easyacc.com, INC is hereby amended to Searay LLC d/b/a Easyacc.com, INC.

This Stipulation hereby amends all prior pleadings and discovery. This Stipulation may be executed in parts.

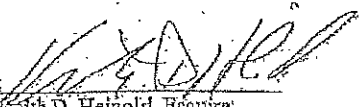
RINE AND STAUD, LLC

MARSHALL, DENNEHEY WARNER
COLEMAN & GOGGIN

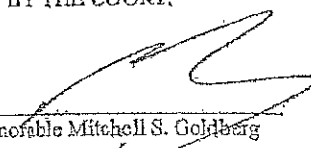
BY:


Paula R. Musil, Esquire

BY:


Keith D. Reinold, Esquire

BY THE COURT:


Honorable Mitchell S. Goldberg

7/31/17